CPA 6A MICS COMPLIANCE CHECKLIST

GAMES/CAGE DEPARTMENTS

Client Name:	Audit Period:	Prepared By:			
NGC Regulation 6A.060(2) requires the CPA to use "criteria established by the chairman" in determining whether a licensee is in compliance with Regulation 6A and the Currency Transaction Reporting Minimum Internal Control Standards (6A MICS). This checklist is to be used by the CPA in determining whether the licensee's gaming and cage operations are in compliance with those requirements. Indicate department (Table Games, Card Games, Slots, Race/Sports Book, Keno, Bingo, Casino Cage, Race/Sports Book Cage, etc.) reviewed in box below:					
Indicate licensee pe	ersonnel contacted:				
Date of Inquiry	Person Interviewed	Position			
bold print), examin procedures were co	Confirmed	Indicate (by tickmark) whether the nentation, through inquiry of licensee l:			

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General Instructions

If the cage department consists of more than one cashiers cage, complete a checklist for each cage to evaluate the licensee's compliance with Regulation 6A and the 6A MICS.

For any Board-authorized computer applications, alternate documentation and/or procedures which achieve the objectives of the 6A MICS will be acceptable. Such alternate documentation and/or procedures must be described in detail as to their acceptability.

Comments by the licensee's personnel such as "this transaction can never happen" will be considered an acceptable response when logical reasons are presented and no violation of Regulation 6A results. Indicate reasons throughout this checklist, where applicable.

In the pit, pit supervisory personnel are considered the individuals handling the transaction.

		Yes	No	Ref.
G	eneral Procedures			
1.	Is the cage a satellite for Comcheck, Western Union, etc.? If yes, describe the specific satellite operation.			
2.	Relating to the previous question, when the cage department performs cash transactions with a patron, do cage personnel comply with the prohibited, recording and reporting requirements of Regulation 6A and the 6A MICS?			
3.	If the licensee posts a sign in the casino, or gives a pamphlet to patrons, does it describe prohibited transactions and/or reportable transactions?			
<u>4.</u>	Relating to the previous question, is the information provided to the patron in compliance with Regulation 6A.090?			
Pi	rohibited Transactions			
5.	Is the exchange of cash for cash in any transaction in which the amount of the exchange is more than \$3,000 prohibited?			

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Note: The definition of cash for this question does not include

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			<u>Yes</u>	<u>No</u>	W/P <u>Ref.</u>
6.	exc inst	coin but does include foreign currency. cashiers (including race/sports books and slots) prohibit the hange of a patron's cash for a check or other negotiable rument, or combination thereof, in an amount greater than 000?			
7.	a pa	cashiers (including race/sports books) prohibit the exchange of atron's cash for any transfer by electronic, wire, or other thod, or combination of methods, in an amount greater than 000?			
8.	pro dep	cashiers (including race and sports books) aware that it is a hibited transaction to accept a cash safekeeping or front money posit and then refund (in excess of \$3,000) the deposit with a ck or different denominations and number of bills?			
Μι	ıltip	ole Transaction Log (MTL)			
<u>9.</u>	rece	n MTL maintained in each monitoring area for purposes of ording information relative to cash transactions? State the nitoring area(s).			
10.	Are	such areas established at:			
	a.	Each single specific cage?			
	b.	All race and sports book cages?			
	c.	The entire writer/seller area at the race and sports book?			
	d.	The entire writer/seller area in the keno department?			
	e.	The entire writer/seller area in the bingo department?			
	f.	The table games department at each single specific gaming pit or grouping of tables supervised by one individual?			
	g.	The card games department at each single specific gaming pit or grouping of tables supervised by one individual?			
	h.	The slot department at least at each high denomination (i.e., ≥ \$25) slot area?			

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			Yes	No	W/P <u>Ref.</u>
<u>11.</u>	Is only one MTL used at a time, podesignated 24-hour period?	er monitoring area, for each	<u>165</u>		
<u>12.</u>	• Is each completed MTL retained in minimum of five years?	n chronological order for a			
<u>13.</u>	Let Is each completed MTL readily avappropriate regulatory and law enf				
<u>14.</u>	 Does the MTL contain the followill loggable transaction: 	ng information for each			
	a. A description of the patron (or identifiers such as age, sex, ratheight and attire?				
	b. Patron's name and agent's nam	ne, if known?			
	c. Table number, station number identification of the location v	r, window number or other where the transaction occurred?			
	d. Time and date of the transacti	on?			
	e. Type of transaction as delinea	ated in Regulation 6A.030(1)?			
	f. Dollar amount of the transacti equivalent?	on or United States dollar			
	g. The amount and type of foreign transactions?	gn currency for foreign currency			
	h. Signature of the handler of ea	ch transaction?			
15.	. If a cage or slot employee sells coin patron for a single exchange in exchange in exchange the department's designated 24-hour part of the state o	cess of \$3,000 during the			
	a. Log the transaction on the MT	TL?			
	b. Complete the identification, rerequirements described in Reg	ecording and reporting gulation 6A.030 for an amount			

Note: A licensee can sell coin to, or purchase coin from, a

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		<u>Yes</u>	<u>No</u>	W/P <u>Ref.</u>
	patron if the identification, recordkeeping and reporting requirements are completed.			
16.	Is a period of time set forth for which each department has designated an established cut-off point for the monitoring of transactions over a 24-hour period?			
17.	Within each department, do the MTL's have the same cut-off time?			
<u>18.</u>	Are such monitoring areas and cut-off times delineated within the system of internal control submitted to the Board and consistent with the established designated 24-hour period used in monitoring areas?			
19.	To make a diligent effort to prevent the circumvention of the prohibitions of Regulation 6A.020 or the reporting and recordkeeping requirements of Regulation 6A.030 by multiple transactions, dissimilar cash-in transactions or dissimilar cash-ou transactions, employees in each monitoring area:	t		
	a. For transactions that they handle, record loggable transaction on MTL's and include the information described in question 14 for the transaction?	ns		
	b. Record loggable transactions immediately after their occurrence?			
	c. At the beginning of each shift, review the MTL for the applicable area of responsibility in order to become familiar with descriptions of individuals whose transactions are being monitored?			
	d. Notify other personnel in the same monitoring area that the monitoring process has been initiated for a particular patron?	2		
	e. During the designated 24-hour period, monitor a patron's transactions for possible supplemental transactions and reportable transactions?			

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f. Record on MTL's any and each succeeding loggable

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			Yes	<u>No</u>	W/P <u>Ref.</u>
		ansaction for individuals being monitored including a single sh transaction exceeding \$10,000?			
20.	At the	conclusion of the designated 24-hour period, is:			
	a. A	new MTL started?			
	b. Th	ne recording of information on the previous MTL ceased?			
		n indication as to the end of the designated 24-hour period corded on the MTL?			
<u>21.</u>	monito	ATL completed for each designated 24-hour period for each oring area, regardless of whether any loggable transactions ccurred?			
<u>22.</u>		oggable transactions were observed for the designated 24- eriod, is an indication such as "no action" recorded on the			
23.	of a de	outine basis, but not to be longer than 24 hours after the end signated 24-hour period, are MTL's submitted to the ating department?			
<u>24.</u>	Are the MTL:	e following transaction types monitored/recorded on the			
		ash-in transactions where an employee accepts or receives ore than \$10,000 in cash from a patron in any transaction:			
	1)	As any table game wager where the patron loses the wager?			
	2)	As any wager which is not a table game wager?			
	3)	As an exchange for its chips, tokens, or other gaming instrumentalities?			
	4)	As a deposit for gaming or safekeeping purposes, including a deposit to a race/sports book account, if the licensee has actual knowledge of the amount of cash deposited?			
	5)	As repayment of credit previously extended?			

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			Yes	<u>No</u>	W/F <u>Ref</u>
	6)	Any other cash-in transaction not specifically addressed?			
b.		sh-out transactions where an employee disburses more than 0,000 in cash to a patron in any transaction:			
	1)	As a redemption of tokens, chips or other gaming instrumentalities?			
	2)	As a payment of winning wager(s)?			
	3)	As a withdrawal of a deposit for gaming purposes, including a withdrawal from a race/sports book account, if the licensee has actual knowledge of the amount of cash withdrawn?			
	4)	As a credit advance (including markers)?			
	5)	As a payment of tournament or contest winnings or a promotional payout?			
	6)	As an exchange for a check or other negotiable instrument?			
	7)	As an exchange for an electronic, wire or other transfer of funds?			
	8)	For travel expenses or other complimentary expenses or for a distribution of a gaming incentive such as settlement of a gaming debt, front money discount, or other similar distribution based upon gaming activity?			
	9)	Any other cash-out transaction not specifically addressed?			
		e MTL include the classification type of cash transaction ed in the prior question?			
trar pati	isact	n employee monitor and record a patron's loggable cash ion on an MTL when they have actual knowledge that a exceeded the \$3,000 loggable transaction threshold by ting same type transactions in amounts of \$3,000 and less?			
Not	te: T	This requirement should be discussed with the			

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employee to determine whether in the execution of his

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<u> 25.</u>

26.

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	or her normal job duties the employee is required to access information (or has accessed information) that would provide knowledge of lesser amounts that may require aggregation. <u>Indicate the records required to be examined that would provide the employee with such knowledge.</u>	<u>Yes</u>	<u>No</u>	W/P <u>Ref.</u>
Play	er Rating Records			
d	player rating records are used as a source document for ocumenting cash activity and for the purposes of complying with egulation 6A, are they retained for a period of five years?			
	summary documents are retained in lieu of original player rating cords, is the following complied with:			
<u>a</u>	The summary documents include, at a minimum on a daily basis, all of the cash transaction information recorded on the original player rating records?			
b	The original player rating records are retained for a minimum of seven days?			
C.	Both original and summary player rating records are retained, if possible, when the records are used as support for a SARC?			
Gan	ing Department Procedures			
Note:	The questions in this section apply to all gaming departments, and other departments such as security, cage, and branch offices that are responsible for compliance with Regulation 6A.			

Job Duties and Responsibilities

29. Do the job duties and responsibilities of officers, employees and agents who are able to conduct, record or approve loggable or reportable transactions, or who are able to conduct prohibited transactions, include the following as applicable to their position:

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			<u>Yes</u>	<u>No</u>	W/P <u>Ref.</u>
	a.	Ensuring that prohibited transactions pursuant to Regulation 6A.020 do not occur?			
	b.	Properly recording all transactions that fall under the criteria of Regulation 6A on the appropriate forms and logs and in the manner prescribed by the 6A MICS?			
	c.	Making a diligent effort to prevent the circumvention of the prohibitions of Regulation 6A.020 or the reporting and recordkeeping requirements of Regulation 6A.030 by multiple transactions within a designated 24-hour period?			
	d.	Being familiar with what is considered a suspicious transaction, and making a diligent effort to identify and report suspicious transactions?			
	e.	Having knowledge of Regulation 6A and the 6A MICS relevant to their position?			
		Note: For Regulation 6A purposes, an independent agent pursuant to Regulation 25, or another person who is not an employee or officer of the licensee or a branch office, is considered an agent of the patron, rather than of the licensee, when party to a transaction for the benefit of another person. Employees or officers, when performing tasks in the performance of their duties on behalf of a patron, are considered the handler of the transaction rather than an agent of the patron. Employees or officers, when conducting a transaction not related to the performance of their duties but rather for their own benefit, are considered a patron for a transaction (or an agent if the transaction was for another person's benefit).			
СТ	RC	C-N			
30.		e CTRC-N forms available to all departments which may counter reportable transactions?			
31.		osequent to obtaining assurance that the reportable transaction supplemental transaction can be properly recorded, is all			

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		<u>Yes</u>	<u>No</u>	W/P <u>Ref.</u>
	required information entered on the CTRC-N in accordance with Regulation 6A.030 and using "NONE", "N/A" for not applicable, "REFUSED", and "U/A" for unavailable as appropriate to complete the report?			
	Note 1: If a patron refuses to provide a social security number and the number is not available from the 6A licensee's records or the patron does not have a social security number, indicate "REFUSED" or "NONE," as applicable, in the social security number box on the report.			
	Note 2: If a patron refuses to provide a permanent address and the address is not available from the 6A licensee's records, a patron does not have a permanent address, or will only provide a post office box number for an address, indicate "REFUSED," "NONE" or the post office box number, as applicable, in the address box on the report.			
	Note 3: If an agent is involved in a transaction and the patron (other than an organization) was not identified or a credential was not available from the licensee's records, indicate "U/A" in the patron method box on the report.			
	Note 4: If, in error, a transaction is completed for a patron without first obtaining an appropriate identification credential from the patron or the patron is no longer available to ask for a credential, indicate "REFUSED" or "U/A," as applicable, in the patron method box on the report.			
<u>32.</u>	Is a copy of each completed CTRC-N retained in chronological order?			
<u>33.</u>	Is a copy of each completed CTRC-N readily available for examination by appropriate regulatory and law enforcement agencies?			

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				Yes	<u>No</u>	W/P <u>Ref.</u>
C7	RC	C-N	Procedures			
34.	the a m	patr nultip simil	patron attempts to complete a transaction that would cause on's transactions to exceed the \$10,000 threshold for either ole same type transaction, a single transaction or a ar transaction, to determine reportability in a monitoring es the individual handling the transaction:			
	a.		iate the procedures for the reporting requirements of gulation 6A?			
	b.		he patron decides to proceed with the transaction, then or to completing the transaction does the employee:			
		1)	Obtain the patron's name and identification credential?			
			Note: An identification credential can be a driver's license, passport, non-resident alien identification card, other reliable government issued identification credential, or other picture identification credential normally acceptable as a means of identification when cashing checks.			
		2)	Obtain, or reasonably attempt to obtain, the patron's permanent address, social security (or EIN) number?			
		3)	Examine the identification credential, including the expiration date, to verify the patron's identity and to the extent possible, the information obtained in 1) and 2) above?			
	c.		he patron decides to cancel the transaction, is a CTRC-N prepared and is the transaction terminated?			
	No	te: (Question 34 also applies to an agent of the patron.			
35.	alie crea	en ide denti	rer's license cannot be obtained, is a passport, non-resident entification card, other government issued identification all or other picture identification credential normally ble as a means of identification when cashing checks d?			

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36. As an option to requesting the necessary identification and other

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			Yes	<u>No</u>	W/P <u>Ref.</u>
		a from a known patron as required in question 34, if ormation on file is used, then:			
	a.	Does the handler of the transaction know the patron?			-
	b.	Was the patron's name and appropriate identification credential previously obtained from the patron?			
	c.	Is the information on file to properly complete a CTRC-N?			
	d.	Is the information on file correct and current?			-
	e.	Is the patron information on file periodically updated as follows:			
		1) Are original identification credentials examined at least every three years?			
		2) Is documentation of the examinations included in the information on file?			
		3) Is the expiration dates of identification credentials included in the information on file?			
	f.	Is the transaction date prior to the identification's expiration date on file?			
<u>37.</u>	the ide	es the CTRC-N indicate "known patron-information on file" as method of verification and include the original method of ntification, including type and number of the identification dential originally examined?			
	No	te: Question 37 also applies to an agent of the patron.			
<u>38.</u>		a CTRC-N completed when a single transaction exceeds 0,000?			
39.	in i	s the table games department developed an adequate procedure monitoring a patron's cash-in transactions for one single, attinuous appearance at one table to report a dissimilar cash-in assaction that exceeds \$10,000?			

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		<u>Yes</u>	<u>No</u>	W/P <u>Ref.</u>
<u>40.</u>	Is a CTRC-N completed when a dissimilar cash-in transaction exceeding \$10,000 occurs during a patron's one single, continuous appearance at a location (table, window, etc.)?			
<u>41.</u>	Is a CTRC-N completed when a dissimilar cash-out transaction exceeding \$10,000 occurs during a patron's one single, continuous appearance at a location (table, window, etc.)?			
<u>42.</u>	Is a CTRC-N completed when the aggregated same type transactions exceed the \$10,000 threshold?			
43.	Do personnel complete the identification and reporting procedures described in Regulation 6A.030 for any supplemental transaction?			
44.	Before completing the last transaction within a series of transactions where the total of a patron's transactions will exceed the \$10,000 threshold of a reportable transaction (i.e., the series of transactions will become a multiple transaction, a dissimilar cashin transaction or a dissimilar cash-out transaction if the transaction is completed), are the identification requirements in questions 34 or 36 applied?			
45.	Once the last transaction is completed and a reportable transaction has occurred, are the reporting requirements of Regulation 6A.030 applied?			
46.	For a single cash table game wager of more than \$10,000, are the identification requirements in either question 34 or 36 complied with before accepting the wager?			
47.	In any situation where the identification requirements in either question 34 or 36 cannot be completed, is the transaction refused?			
48.	Relating to question 47, in the case of a dispute involving the payment of winnings or the redemption of chips, is the casino shift manager or another individual of authority notified and, if the licensee and the patron are unable to resolve the dispute regarding the payment of alleged winnings to the patron's satisfaction, does the licensee immediately notify the Board?			
49.	In any situation where identification requirements are not			

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complied with but the transaction was completed, does the

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	licensee attempt to obtain the necessary information and identity credential from the patron?			
50.	If an identity credential is not obtained, is the patron barred from further gaming and a CTRC-N prepared, all in accordance with Regulation 6A.030(7)?			
51.	For purposes of barring the patron, is the description (and name, if known) of the patron communicated to all personnel in security, gaming or gaming related areas, the accounting department and affiliates?			
<u>52.</u>	Does the handler of the transaction sign the CTRC-N prior to transmitting the CTRC-N to the accounting department?			
53.	Are the forms sent to the accounting department within 24 hours after the end of the designated 24-hour period.?			
SÆ	ARC			
54.	Are SARC forms available to all departments which may encounter suspicious transactions?			
<u>55.</u>	Are SARC forms completed in accordance with Regulation 6A.100 and contain all the relevant information requested on the form?			
56.	Is a completed SARC considered a confidential document pursuant to Regulation 6A.100(6)?			
57.	Is the patron not informed that a report was completed pursuant to Regulation 6A.100(6)?			
<u>58.</u>	Is a copy of a completed SARC retained, along with all supporting documentation, in chronological order?			
<u>59.</u>	Is a copy of a completed SARC readily available for examination by appropriate regulatory and law enforcement agencies?			

SARC Procedures

60. When an employee determines that a possible suspicious

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		Yes	<u>No</u>	W/P <u>Ref.</u>
	transaction has occurred, is the suspicious activity analyst notified?			
61.	Does the licensee's submitted system of internal control indicate the procedures in identifying and reporting suspicious transactions to the applicable departments?			
62.	For suspicious transactions, do appropriate personnel complete a SARC within 24 hours once the transaction is considered suspicious?			
63.	Is the SARC forwarded to the accounting department within 24 hours of the completion of the form?			
Ga	nming, Safekeeping or Front Money Deposits			
	estion 64 through 74 are only applicable to cage department cluding race/sports books).			
64.	Does the cage employee, for all gaming, front money or safekeeping deposit and withdrawal cash transactions greater than \$3,000, record the transaction on a receipt form in accordance with Minimum Internal Control Standards and in accordance with Regulation 6A.020(7)?			
65.	If funds are physically segregated, is an indication of such recorded on the receipt form?			
	Note: The above question also applies to any deposits made in foreign currency.			
66.	Is the nature of any noncash deposit documented on the receipt form?			
67.	Is the method or methods used to accommodate deposits (i.e., physically segregating or recording the denomination and number of bills) described in the system of internal control submitted to the Board?			
68.	When a patron's cash deposit is transferred to a licensee's affiliate, is the denomination and the number of bills of each denomination of the cash deposited communicated to the affiliate?			

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				W/P
		<u>Yes</u>	<u>No</u>	Ref.
69.	When a cash deposit transfer is received from an affiliate, for all full and partial returns of each deposit, does the licensee return to the patron only cash of the same denominations and no more than the same number of bills of each denomination as was deposited?			
70.	When a cash deposit is received from an affiliate, are the denominations and the number of bills of each denomination of the cash returned, recorded and communicated to the transferring licensee?			
71.	If the cash deposit is verified gaming winnings, is this fact documented on the receipt form (e.g., slot jackpot, keno ticket, etc.)?			
72.	For the cash deposit to be considered gaming winnings, do the cash winnings remain within the sight of a casino employee between the time paid and the time deposited?			
73.	Is this employee's name recorded on the receipt?			
74.	Are cage personnel aware that a cash deposit is not considered put at risk by the issuance of a marker and thus not be treated as verified gaming winnings for the purposes of obtaining a check?			
Ot	her Procedures			
	estion 75 through 77 are only applicable to cashiers (including e/sports books) and slots.			
75.	If a patron is issued a check or other negotiable instrument, or the licensee initiates a transfer of funds for the patron's benefit in exchange for verified cash gaming winnings (e.g., slot jackpot, keno ticket, etc.), have the cash winnings remained within the sight of the casino employee between the time paid and the time delivered to the cage (or other appropriate place) for the processing of the exchange and, if applicable, transfer documentation pursuant to Regulation 6A.080 is maintained, so that the issuance of the check is in accordance with Regulation 6A.020?			
	Note 1: For situations where a patron redeems chips for cash			

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and then the patron requests a check, negotiable instrument or transfer of funds, the above question

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			Yes	<u>No</u>	W/P <u>Ref.</u>
		applies.			
	Note 2:	If eventually paid via check or transfer and the cash remains under the control or sight of the licensee, the payment of winnings (or redemption of chips) will be considered a noncash transaction; accordingly, the reporting and logging requirements are not applicable.			
76.	licensee exchang account, been sub wagers a substant applicab 6A.080 accordan	on is issued a check or other negotiable instrument, or the initiates a transfer of funds for the patron's benefit in e for a withdrawal of funds from a race/sports book does the withdrawal consist of amounts verified to have estantially accumulated by the patron through winning and where any cash deposits to the account have been itally (i.e., at least 75%) placed at risk by the patron and, if the, is transfer documentation pursuant to Regulation maintained so that the issuance of the check is in the with Regulation 6A.020? A consistent cash flow inventory method (e.g., first in,			
	1,000 1.	first out) is used to determine if deposits have been placed at risk. The same method is used for all			
	Note 2:	patrons. If a patron's gaming account functions in the same manner as a race/sports book account whereby the account balance is reduced for wagers made, then question 76 applies to that account.			
77.	If the licensee issues a check or other negotiable instrument, or the licensee initiates a transfer of funds for the patron's benefit pursuant to questions 75 and 76, is documentation as to how the verification was made created and maintained (e.g., the name of the employee representing that the cash had been won by the patron and the name of the employee who had the cash remain in their sight between the time the cash was paid and the time delivered to the cage for the issuance of a check; a printout of the patron's account activity and the name of the employee attesting that any deposits had been risked; etc.) in addition to routine supporting documentation for a disbursement?				

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		Yes	<u>No</u>	W/P <u>Ref.</u>
	Note: If player rating records are used to support such a verification, those particular player rating records are retained.			
78.	For games other than table games, card games, and slot machines, when a patron makes a noncash wager greater than \$3,000, is documentation of the nature of each of these wagers made and maintained?			
79.	For games other than table games, card games, and slot machines, when a patron is paid greater than \$3,000 for a winning wager in a form other than cash, is documentation of the nature this payout made and maintained?			
80.	For chip/token redemptions of more than \$3,000, if the patron's name is not known, is the applicable gaming area contacted to inquire if the patron's name is available?			

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